REMARKS

Claims 1-9 were examined and reported in the Office Action. Claims 1-9 are rejected. Claim 1 is amended. Claims 1-9 remain.

Applicant requests reconsideration of the application in view of the following remarks.

I. 35 U.S.C. § 102(b)

It is asserted in the Office Action that claims 1-9 are rejected in the Office Action under 35 U.S.C. § 102(b), as being anticipated by U.S. Patent No. 5,648,793, issued to Chen ("Chen"). Applicant respectfully disagrees.

According to MPEP 2131, "'[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.' (Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). 'The identical invention must be shown in as complete detail as is contained in the ... claim.' (Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). The elements must be arranged as required by the claim, but this is not an ipsissimis verbis test, i.e., identity of terminology is not required. (In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990))."

Applicant's amended claim 1 contains the limitations of "providing an LCD with a number of columns, providing an LCD with a number of rows, providing a number of pixels to said LCD, and driving the LCD by an applied field parameter selected from the group multi-row, multi-column and multi-pixel inversion, said inversion is applied for two or more consecutive pixel frames to provide a reduced total fringe field effect to maintain contrast and a minimised flickering on a display." In other words, Applicant's claimed invention is directed to a driving method with multiple inversion techniques for driving a liquid crystal display such that contrast is maintained while minimising the perception of flickering (See Applicant's specification, page 7, lines 24 - 28). The

"multiple" inversion method limitations contained in amended claim 1 involves applying the inversion of two (or more) consecutive frames.

Chen discloses a method for driving an LCD including individual inversion of alternate rows and a similar individual inversion method to effect dot inversion. Further, Chen describes the inversion of one field or one dot at a time. Chen, however, does not teach, disclose or suggest multiple inversion is applied for two or more consecutive pixel frames (See, e.g., Chen, column 2, line 65 to column 3, line 7).

The difference between Applicant's claimed multiple inversion method and the method disclosed by Chen is further illustrated by comparing Applicant's Figures 16 to 18 with the row and dot inversion illustrated in Figures 4b and 4c of Chen. In contrast to Figures 4b and 4c of Chen, Applicant's Figures 16 to 18 illustrate that the applied field parameter for driving a liquid crystal display is such that inversion is applied for two (or more) consecutive frames.

Moreover, there wouldn't be any motivation to arrive at Applicant's claimed invention in view of Chen since Chen does not indicate multiple inversion, nor mention any problems that would lead a skilled person in the art to adapt the teaching of Chen to arrive at Applicant's multiple inversion technique. It should be noted that certain alternatives are disclosed in Chen (see, Chen, column 4, lines 26 – 31). Those alternatives, however, relate to the duration of the driving pulses and do not teach, suggest or disclose Applicant's driving method.

Therefore, since Chen does not disclose, teach or suggest all of Applicant's amended claim 1 limitations, Applicant respectfully asserts that a *prima facie* rejection under 35 U.S.C. § 102(b) has not been adequately set forth relative to Chen. Thus, Applicant's amended claim 1 is not anticipated by Chen. Additionally, the claims that depend directly or indirectly on claim 1, namely claims 2 -9, are also not anticipated by Chen for the above same reason.

Accordingly, withdrawal of the 35 U.S.C. § 102(b), rejections for claims 1-9 is respectfully requested.

II. Other Prior Art

Applicant presents the following discussion regarding U.S. Patent No. 5,790,092 issued to Moriyama ("Moriyama") for the Examiner's benefit.

Moriyama discloses providing a liquid crystal display with reduced power dissipation. The control method disclosed by Moriyama drives the pixels in the display in a somewhat arbitrary manner by selecting, and inverting certain arbitrary neighboring pixels in a given row direction. (See, Moriyama, Abstract; column 8, lines 8-55). In contrast, Applicant's amended claim 1 claims a systematic method for driving an LCD with a multiple inversion technique where inversion is applied for two or more consecutive pixel frames.

Moreover, Moriyama does not address the same issues addressed by Applicant's claimed invention. Moriyama relates to reducing power dissipation. (Moriyama, column 7, line 65 - column 8, line 2). This problem is distinguishable from minimizing the fringe field effect, as addressed by Applicant's claimed invention. Applicant's claimed invention advantageously provides a method directed towards overcoming flickering and the fringe field effect observed in liquid crystal displays. The problems arising from flickering and the fringe field effect are discussed in Applicant's specification, paragraphs 1-3 on page 1.

Thus, since Moriyama does not disclose, teach or suggest all of Applicant's amended claim 1 limitations, Applicant respectfully asserts that a *prima facie* rejection under 35 U.S.C. § 102(b) can not be adequately set forth relative to Moriyama. Thus, Applicant's amended claim 1 would not be anticipated by Moriyama.

Additionally, since neither Chen, Moriyama, nor the combination of the two disclose, teach or suggest all the limitations contained in Applicant's amended claim 1, as listed above, there would not be any motivation to arrive at Applicant's claimed invention by combining the teachings of Moriyama with those of Chen. Thus, Applicant's amended claim 1 is not obvious over Moriyama in view of Chen since a *prima facie* case of obviousness can not be met under MPEP 2142.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely 1-9, patentably define the subject invention over the prior art of record and are in condition for allowance and such action is earnestly solicited at the earliest possible date.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.